

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

National Association for the Advancement of Colored People, Inc. by and through its Myrtle Beach Branch, Samuel Jones, Leslie Stevenson, and Cedric Stevenson,

Plaintiffs,

v.

City of Myrtle Beach, a municipal corporation within the State of South Carolina and City of Myrtle Beach Police Department, a department of the City of Myrtle Beach,

Defendants.

C.A. NO. 4:18-CV-00554-DCC

AFFIDAVIT OF CATHIE RHODES

Cathie Rhodes with the Myrtle Beach Police Department (“MBPD”) affirms the following:

1. I have been a Class 2 law enforcement officer with the MBPD for almost 16 years.
2. I am currently the Support Services Manager for the MBPD.
3. Part of my duties with the MBPD includes maintaining the data on the MBPD’s Computer Aided Dispatch system (“CAD”) and the Records Management System (“RMS”).
4. The CAD and RMS keep a log of MBPD’s calls for service and the resulting reports.
5. The data in CAD and RMS is made at or near the time of the event by someone with knowledge.
6. The data in CAD and RMS is kept in the course of MBPD’s regular activity, and creating the data is part of MBPD’s regular activity.
7. Using the MBPD’s CAD and RMS, I created the following graphs: Motor Vehicle Accident with Injury Calls for Service; Myrtle Beach Response Times during Loop Hours; and Memorial Day Weekend Serious Crimes Reported.

8. I created the graph entitled Horry County Fire Rescue Response Times using data provided to me by Renee Hardwick with Horry County.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on



Support Services Manager Cathie Rhodes

March 26, 2018